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**ORIGINAL  
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October 29, 1992

**RECEIVED**

**OCT 29 1992**

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

Ms. Donna R. Searcy  
Secretary  
Federal Communications Commission  
1919 M Street, N.W.  
Washington, D.C. 20554

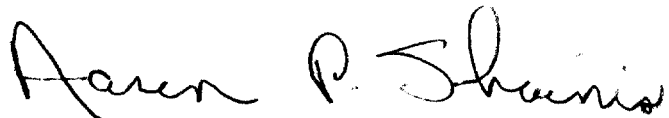
Re: Wickenburg, AZ  
MM Docket No.  
RM-

Dear Ms. Searcy:

Transmitted herewith, on behalf of Circle S Broadcasting Co., licensee of Station KFMA(FM), Wickenburg, Arizona, are an original and five (5) copies of its Petition for Rulemaking, which requests the deletion of Channel 229A and the substitution of Channel 231C3 at Wickenburg, Arizona.

Should further information be desired in connection with this Petition, please communicate with the undersigned.

Very truly yours,



Aaron P. Shainis  
Counsel for  
CIRCLE S BROADCASTING CO.

APS:bpt  
Enclosures  
26094.00\Searcy.028

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List A B C D E

Before the  
Federal Communications Commission  
Washington, D.C. 20554

RECEIVED  
OCT 29 1992

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

In the Matter of )  
 )  
Amendment of Section ) MM Docket No.  
73.202(b) ) RM-  
FM Broadcast Stations )  
(Wickenburg, Arizona) )

To: Chief, Allocations Branch  
Policy and Rules Division  
Mass Media Bureau

PETITION FOR RULEMAKING

Circle S Broadcasting Co. ("Circle S"), licensee of Station KFMA(FM), Wickenburg, Arizona, by its attorneys, hereby files its Petition for Rulemaking which seeks the amendment of the Commission's FM Table of Allotments in order to allot Channel 231C3 to the community of Wickenburg, Arizona. In support whereof, the following is submitted:

1. Station KFMA(FM) presently operates on Channel 229A. Circle S proposes that the Commission delete that channel and substitute Channel 231C3 at Wickenburg. Such an allocation can be made in accordance with the Commission's minimum distance separation and principal community coverage requirements with a site restriction of 18.65 kilometers to the southwest of Wickenburg.

2. Station KFMA(FM) presently serves a total of 9,303 persons within its 60 dBu contour. If its proposed upgrade were approved, Station KFMA(FM) would be able to serve a total of 12,929 persons within its 60 dBu, a population increase of

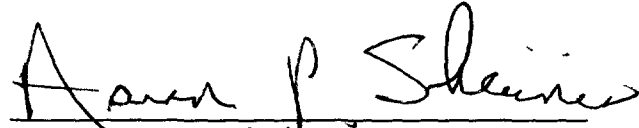
40 percent. Similarly, the land area within the 60 dBu of KFMA(FM) would almost double from 2,520 square kilometers to 4,783 kilometers.

3. Accordingly, for the reasons stated above, Circle S requests that the Commission adopt this petition to substitute Channel 231C3 for 229A at Wickenburg, Arizona. In the event that the Commission allots Channel 231C3 to Wickenburg, Circle S will promptly file an application to modify its present license for Station KFMA(FM) and, if that application is granted, will immediately upgrade its station and begin broadcasting on the newly allotted channel.

Respectfully submitted,

CIRCLE S BROADCASTING CO.

By:

  
Aaron P. Shainis

By:

  
Lee J. Peltzman

Its Attorneys

**BARAFF, KOERNER, OLENDER  
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**October 29, 1992**

26094.00\Pleading.028

***KLEIN  
BROADCAST  
ENGINEERING***

**FCC ORIGINAL**

*dedicated to improving the science and technology of radio & television communications*

*ENGINEERING EXHIBIT  
IN SUPPORT OF PETITION  
FOR RULE MAKING  
CHANNEL 231C3 at WICKENBURG, AZ.  
PREPARED FOR  
CIRCLE S BROADCASTING CO.  
WICKENBURG , ARIZONA*

*OCTOBER 1992*

# ***KLEIN BROADCAST ENGINEERING***

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OCTOBER 1992

## ENGINEERING EXHIBIT IN SUPPORT OF PETITION FOR PROPOSED RULE MAKING

CIRCLE S BROADCASTING COMPANY, INC.

PROPOSED FM CHANNEL 231 C3

WICKENBURG , ARIZONA

### INTRODUCTION and ENGINEERING STATEMENT

The petitioner, Circle S Broadcasting Company, Inc. has retained the firm of Klein Broadcast Engineering to prepare the required engineering exhibits in support of its Petition for Proposed Rule Making. The petition proposes to amend the FM Table of FM Channel Allotments, Section 73.202 of the Rules and Regulations of the Federal Communications Commission, as follows:

Present FM Channel 209 A / Wickenburg, Arizona

Present FM Channel 229 A / Wickenburg, Arizona

Present FM Channel 287 C1 / Wickenburg, Arizona

---

Present FM Channel 209 A / Wickenburg, Arizona

Proposed FM Channel 231 C3 / Wickenburg, Arizona

Present FM Channel 287 C1 / Wickenburg, Arizona

Through this engineering exhibit, the petitioner demonstrates compliance of the Proposed FM Channel Class upgrade to FM Class C3, with Section 73.207 of the Rules and Regulations of the Federal Communications Commission as amended to date. The proposed FM Channel upgraded allotment was based on the reference geographic coordinates for the Community of Wickenburg, Arizona and are listed as:

NL: 33 - 58 - 00

WL:112 - 43 - 48

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INTRODUCTION and ENGINEERING STATEMENT cont'd page two:

CIRCLE S BROADCASTING COMPANY, INC.  
WICKENBURG , ARIZONA

The actual transmitter site coordinates for the location of the proposed Class C3 transmission facility is listed as:

NL: 33 - 51 - 31  
WL: 112 - 53 - 04

The petition proposes to delete FM Channel 229 A and substitute FM Channel 231 C3. The petitioner is also the licensee of KFMA (FM) at Wickenburg, Arizona. KFMA (FM) presently operates on FM Channel 229 A. The petitioner requests the Commission to specify operation of KFMA (FM) on the proposed FM Channel 231 C3, at Wickenburg, Arizona. This allocation may be made in compliance with Section 73.207 of the Commission's Rules with the use of a site restriction of 18.65 kilometers southwest of the reference coordinates of Wickenburg, Arizona. Exhibit E-1 is an FM spacing study run from coordinates generated located 18.65 kilometers southwest of Wickenburg, Arizona, as listed above.

In addition the requested upgrade and amendment may be accomplished through the recent amendment to the U.S. / Mexican FM Broadcasting Agreement, as modified on August 11, 1992. Engineering Exhibit E-1 is an FCC FM Spacing Study as run from the coordinates 18.65 kilometers southwest of the Community of Wickenburg, Arizona, the petitioner proposes these coordinates to be the reference coordinates for the upgraded allocation. This FM spacing study shows a short spacing to an allocation at Sonoita, Sonora, Mexico. The new amended U.S./Mexican agreement requires a distance of 211 kilometers spacing between a U.S. Class B1/C3 to a Mexican Class B. Exhibit E-1 shows a spacing of 221.9 kilometers and is therefore not short spaced under the new agreement. Therefore the proposed use of FM Channel 231 C3 from the site restricted coordinates specified herein is permissible.

The allocation site specified in this petition is 18.65 kilometers SW of the community of Wickenburg, Arizona. Using maximum FM Class "C3" facilities, 25 kilowatts E.R.P. at 100 meters height above average terrain or its equivalent from a higher elevation, from this site the City Grade contour of 70 dBu (3.16 mV/M) would extend well beyond the community of Wickenburg, Arizona, thus providing the community of Wickenburg, Arizona with the required City Grade coverage from the restricted coordinates specified herein and would be in compliance with Section 73.315 of the Commission's Rules as amended to date.

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INTRODUCTION and ENGINEERING STATEMENT cont'd page three:

CIRCLE S BROADCASTING COMPANY, INC.  
WICKENBURG , ARIZONA

The land area within the 60 dBu contour of the petitioner's Class A facility for KFMA (FM) is 2520.1 square kilometers. The land area to be served within the proposed upgraded Class C3 facility would be 4,783.2 square kilometers. This is an increase of almost double the present area within the 60 dBu contour of the present Class A facility for KFMA (FM) and would provide Wickenburg , Arizona with its second wide area FM service.

The population to be served by the existing Class A KFMA (FM) facility is 9,303 persons (1986 U.S. Census), within the 60 dBu contour. The population within the 60 dBu contour of a Class C3 facility would increase to 12,929 persons (1986 U.S. Census), this is an increase of population served within the 60 dBu contour of 1.4 times the population as presently served by the KFMA (FM) Class A facility.

The petitioner, Circle S Broadcasting Company, Inc., has provided the Commission with an FM spacing study to show the upgrade to FM Channel 231 C3 can be made in full compliance with Section 73.207 of the Commission's Rules, from the site location specified herein, using the site restricted coordinates.

Therefore, the petitioner, Circle S Broadcasting Company, Inc., requests the Commission consider and GRANT this petition for proposed rule making for the requested amendment of the FM Table of Allotments, Section 73.202 of the Commission's Rules as specified herein, to reflect the upgrade of KFMA (FM) for Class C3 operation on FM Channel 231 C3 at Wickenburg, Arizona.

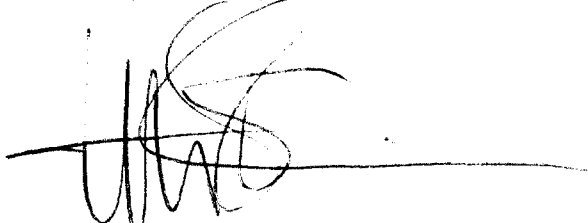
The petitioner, promises the Commission, that if this Proposed Rule Making Petition is granted for the requested FM channel upgrade, Circle S Broadcasting Company, Inc. , will file a minor change application on FCC Form 301, to modify its presently valid FCC FM Broadcast Station license for KFMA(FM), for the FM Class C3 facilities requested herein, within 90 days of the final action of the Commission granting this Petition for Proposed Rule Making.

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INTRODUCTION and ENGINEERING STATEMENT cont'd page four:

CIRCLE S BROADCASTING COMPANY, INC.  
WICKENBURG , ARIZONA

Respectfully submitted,

A handwritten signature in dark ink, appearing to read 'E. Klein', with a long horizontal line extending to the right.

Elliott Kurt Klein,  
Consulting Broadcast Engineer

23      October      1992



# ***KLEIN BROADCAST ENGINEERING***

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CIRCLE S BROADCASTING COMPANY, INC.

EXHIBIT E-1

FCC FM SPACING STUDY for CLASS C3 UPGRADE  
FM CHANNEL 231  
WICKENBURG , ARIZONA

(using site restricted coordinates as specified)

(follows this page)

Klein Broadcast Engineering  
Paradise Valley, Arizona

FM Spacing study

Title: CIRCLE S BROADCASTING / C3 UPGRADE  
Channel 231C3 ( 94.1 MHz)  
Database: FCC 09/28/92

Latitude: 33-51-31  
Longitude: 112-53-04  
Safety zone: 45 km

Call	Auth	Licensee name	Chan	ERP-kW	Latitude	Br-to	Dist.	Req.
City of License	St	FCC File no.	Freq	EAH-m	Longitude	-from	(km)	(km)

NEW	APC	Patricia A. Korn	228C	29	35-02-06	314.3	188.8	96
Laughlin	NV	BPH-890914MR	93.5	495	114-22-09	133.4	92.80	CLEAR
DDC-91-71; Cut-off 06/26/90; Initial Decision to Deny; ERP is below the minimum for class-Initial decision 920311								

ALLOD			229A		33-55-53	42.8	11.02	42
Wickenburg	AZ	DOC-91-133	93.7		112-48-12	222.8	-31.0	SHORT
Filing window 11/19-12/19/91 **CLOSED** ; Proposed to Mexico as B 910507-Accepted by Mexico 910917; Site restricted-Effective 11-18-91								

KFMA	CP	Circle S Broadcasting Co	229A	1.50	33-55-32	48.3	11.19	42
Wickenburg	AZ	BPH-911218MA	93.7	201	112-47-38	228.3	-30.8	SHORT
ERP/HAAT Combination exceeds maximum value allowed under International; agreements								

ALLOD			230C		34-58-08	45.3	176.6	176
Flagstaff	AZ		93.9		111-30-28	226.0	.599	CLOSE
Coordinates updated from LIC record BLH6958								

KMBN	LIC	Northland Broadcasting,	230C	100	34-58-08	45.3	176.6	176
Flagstaff	AZ	BLH-6958	93.9	460BT	111-30-28	226.0	.599	CLOSE

**ALLOD			231B		31-51-52	175.3	221.9	240
Sonoita	SD		94.1		112-41-30	355.4	-18.1	SHORT

ALLOD			232A		33-40-06	260.6	125.5	89
Quartzsite	AZ	DOC-83-603	94.3		114-13-12	79.9	36.52	CLEAR
Filing window 03/14-04/14/86 **CLOSED** ; EFFECTIVE 3-13-86								

KBUX	LIC	Buck Burdette	232A	3	33-40-58	261.5	126.4	89
Quartzsite	AZ	BLH-880919KC	94.3	-48	114-13-59	80.7	37.44	CLEAR

NEW	APC	Buck Burdette	232A	.21	33-40-58	261.5	126.4	89
Quartzsite	AZ	BMPH-871127II	94.3	-48	114-13-59	80.7	37.44	CLEAR

KOQL-FM LIC	Adams Radio of Phoenix,	233C	100		33-20-02	127.2	96.02	96
Phoenix	AZ	BLH-860112KB	94.5	504	112-03-42	307.7	.019	CLOSE

ALLOD			233C		33-20-02	127.2	96.02	96
Phoenix	AZ		94.5		112-03-42	307.7	.019	CLOSE
Coordinates updated from LIC record BLH860112KB								

ALLOD			234C		35-06-40	326.9	166.6	96
Kingman	AZ		94.7		113-53-08	146.3	70.61	CLEAR
Coordinates updated from LIC record BLH870511KB								

Klein Broadcast Engineering  
Paradise Valley, Arizona

FM Spacing study

Title: CIRCLE S BROADCASTING / C3 UPGRADE  
Channel 231C3 ( 94.1 MHz)

Latitude: 33-51-31  
Longitude: 112-53-04

Call	Auth	Licensee name	Chan	ERP-kW	Latitude	Br-to	Dist.	Req.
City of License	St	FCC File no.	Freq	EAH-m	Longitude	-from	(km)	(km)
ALLOD			284C		33-20-04	127.1	96.13	31
Mesa	AZ		104.7		112-03-35	307.6	65.13	CLEAR
Coordinates updated from LIC record			BLH6100					
XHMC-FM			285A	.97	32-40-02	241.7	273.1	25
Mexicali	BJ		104.9	55	115-26-58	60.2	248.1	CLEAR

>> End of channel 231C3 study <<

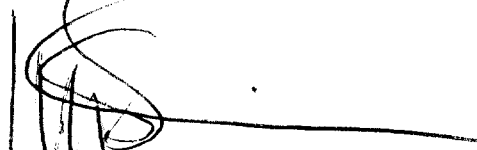
\*\* Under the amended U.S./Mexican FM Broadcasting Agreement the required spacing to this Mexican allocation is 211 kilometers and is therefore not short spaced.

# KLEIN BROADCAST ENGINEERING

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STATE of ARIZONA )  
CITY of SCOTTSDALE ) ss:  
COUNTY of MARICOPA )

Elliott Kurt Klein, being duly sworn states, that he is a consulting broadcast engineer with offices located at 5529 East Sapphire Lane, Paradise Valley, Arizona 85253. That he has been employed in the broadcast engineering profession since 1967, and that he has prepared many different reports and applications and presented them before the Federal Communications Commission, over the past twenty-six years. That his engineering qualifications are a matter of record with the Federal Communications Commission. That he has held a valid First Class Radiotelephone Operators License since 1967. That his present license number is PG-11-21248, valid for life. That he is a member in good standing of The Society of Broadcast Engineers since 1969 (SBE). That he is a member in good standing of the Institute of Electrical and Electronic Engineers (IEEE). That the calculations and or measurements and exhibits in the accompanying report or application were made by him personally or under his supervision and direction, and that all facts contained herein are true of his own personal knowledge and belief, and on such facts or statements made on belief, they are believed to be true. He assumes no liability for any errors or omissions and shall not be liable for injuries and/or damages (including consequential) which might result from use of said information. All pages, engineering exhibits, and statements are covered under the copyright laws of the United States of America and remain the property of the client and Klein Broadcast Engineering. Any unauthorized use or reproduction is prohibited by law.

  
Affiant: Elliott Kurt Klein for the firm:

KLEIN BROADCAST ENGINEERING

Subscribed and sworn to before me,



this 23rd day of October 19 92

Sara J. Briggs Nov. 23, 1994  
Notary Public: Date of Commission Expiration: